



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: **THERESE HIGGINS**

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 01/01/1988, AGAINST MOS HIGGINS:
ALLEGATION:

1. FAILED TO PREPARE AN AIDED REPORT AND JUVENILE REPORT

ACTION TAKEN: COMMAND DISCIPLINE ISSUED

Disclosure # 2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 01/01/1990, AGAINST MOS HIGGINS:
ALLEGATION:

1. FAILED TO PREPARE COMPLAINT REPORT

ACTION TAKEN: COMMAND DISCIPLINE ISSUED

Disclosure # 3:

THE NYPD ISSUED THE FOLLOWING DEPARTMENTAL CHARGES AND SPECIFICATIONS, DATED 02/07/1994, AGAINST MOS HIGGINS:

1. DID CONDUCT PERSONAL BUSINESS WHILE ON PATROL.
2. DID NEGLECT TO MAKE AN ENTRY IN HIS ACTIVITY LOG.
3. DID NEGLECT TO MAKE AN ENTRY IN HIS ACTIVITY LOG
4. FAIL AND NEGLECT TO NOTIFY THE RADIO DISPATCHER OF ALL ASSIGNMENTS

ACTION TAKEN: FORFEITURE OF FIVE (5) VACATION DAYS

Disclosure # 4:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 09/26/1995, AGAINST MOS HIGGINS:
ALLEGATION:

1. COMPLAINANT ALLEGED THAT SHE WAS FRISKED IN AN INAPPROPRIATE MANNER

Disclosure # 5:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 10/22/2000, AGAINST MOS HIGGINS:
ALLEGATION:

1. MOS HIGGINS INVOLVED IN A VERBAL DISPUTE WITH AN INDIVIDUAL KNOWN TO THE DEPARTMENT, IN A STORE LINE. SAID INDIVIDUAL KNOWN TO THE DEPARTMENT THEN ASSAULTED

MOS HIGGINS.

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